

## **REMARKS**

### **Amendments**

#### ***Amendments to the Claims***

Applicant has amended claims 2, 11, 16 and 23. No new matter has been added as a result of these amendments.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 102(b)***

#### **Claims 2-8, 11-14, 16-21, and 23-26**

Claims 2-8, 11-14, 16-21, and 23-26 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Stortz, U.S. Patent No. 5,900,885. Applicant respectfully submits that Stortz does not teach each and every element of the invention as claimed in claims 2-8, 11-14, 16-21, and 23-26.

Stortz discloses a composite video buffer. The composite video frame buffer comprises interleaved portions of the dedicated and incremental video buffers 42a and 42b respectively. The contents of the dedicated and incremental video buffers are interleaved to produce a single interlaced video frame. Because the data is interleaved, each buffer only contains data for part of the video frame. Thus, both buffers are used to create a single video frame.

With regards to claims 2, 11, 16, and 23, Applicant claims a frame of color data is written into the frame-preparation memory at a frame rate. The Examiner equates Applicant's frame-preparation and refresh memories to Stortz's two video buffers. However, Applicant's frame preparation memory holds a frame of color data. In contrast, Stortz's incremental video buffer only holds part of a video frame because both the incremental and dedicated video buffers are used to interleave one frame of video. Further, Stortz fails to disclose that the incremental video buffer is a frame preparation buffer. Furthermore, Stortz does not disclose that the incremental buffer can hold a frame of video. Thus, Stortz does not teach or suggest the claimed element as claimed in claim 2, 11, 16, and 23. Therefore, Applicant respectfully submits that claims 2-8, 11-14, 16-21,

and 23-26 are not anticipated by Stortz under 35 U.S.C. § 102(b) and respectfully requests the withdrawal of the rejection of the claims.

***Rejections under 35 U.S.C. § 103(a)***

**Claim 9**

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being obvious over Stortz in view of Akeley, US Patent No. 6,075,543. Applicant respectfully submits that the combination is improperly motivated.

Akeley discloses managing multiple independent frame buffers by maintaining a queue of buffers. Rendering is enabled to a back buffer. Once rendering to the back buffer is complete, the back buffer is appended to the queue and becomes the new front buffer. However, Akeley does not disclose how the buffers are mapped relative to frame preparation or refresh memories.

There is no proper motivation to combine Akeley with Stortz. A proposed modification cannot change the principle of operation of a reference (MPEP 2143.02). This combination is improper because the modification replaces Stortz's combined buffer system with Akeley's independent buffering system. Akeley manipulates and swaps full frames buffers, whereas Stortz uses partial buffers. Thus, the motivation asserted by the Examiner changes Stortz's principle of operation and, therefore, the combination is improper.

Furthermore, the combination does not teach or suggest all of the claims elements in claim 9. Claim 9 depends on independent claim 2. In claim 2, Applicant recites a frame of color data is written into the frame-preparation memory at frame rate. Because Akeley does not disclose how the buffers are mapped onto a frame-preparation memory, Akeley cannot disclose a frame of color data is written into the frame-preparation memory at frame rate. Furthermore, Stortz does not teach or suggest this claim element. Therefore, the combination cannot be properly interpreted as disclosing claim 2 and claim 9 that depend on it.

Accordingly, the combination cannot render obvious Applicant's claim 9 and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

### **SUMMARY**

Claims 2-9, 11-14, 16-21 and 23-26 are currently pending. In view of the foregoing remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

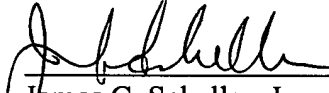
If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact the undersigned at (408) 720-8300.

### **Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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